

Before the
Federal Communications Commission
Washington, D.C. 20554

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| In the Matter of |) | |
| |) | |
| Amendment of Parts 2 and 25 to Implement |) | IB Docket No. 99-67 |
| the Global Mobile Personal Communications |) | |
| by Satellite (GMPCS) Memorandum of |) | |
| Understanding and Arrangements |) | |
| |) | |
| Petition of the National Telecommunications |) | RM-9165 |
| And Information Administration to Amend |) | |
| Part 25 of the Commission's Rules to Establish |) | |
| Emissions Limits for Mobile and Portable |) | |
| Earth Stations Operating in the |) | |
| 1610-1660.5 MHz Band |) | |

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FEDERAL COMMUNICATIONS COMMISSION
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COMMENTS OF LEO ONE USA CORPORATION

Leo One USA Corporation ("Leo One USA"), by its attorneys, hereby submits these comments in support of the Commission's proposal to implement the Global Mobile Personal Communications by Satellite ("GMPCS") Memorandum of Understanding ("MoU").¹ The GMPCS MoU will facilitate the operation of global mobile satellite systems, and the domestic implementation of the GMPCS MoU is critical to its success.

The GMPCS MoU was developed to promote the introduction of Mobile Satellite Services ("MSS") by facilitating the transborder movement of MSS receiver terminals. Because MSS systems provide global coverage, users need an efficient and effective mechanism for moving receiver terminals across borders without the need for individual licensing of each unit by every country.

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¹ *Amendment of Parts 2 and 25 to Implement the Global Mobile Personal Communications by Satellite (GMPCS) Memorandum of Understanding and Arrangements, IB Docket No. 99-67, Notice of Proposed Rulemaking (released March 5, 1999).*

The GMPCS MoU created a universal approach for countries to voluntarily adopt. Under the GMPCS MoU, any terminal equipment certified by any Administration becomes eligible to use the "GMPCS-MoU ITU Registry" mark after notification to the ITU. Equipment bearing this mark should be allowed to enter countries endorsing the GMPCS MoU either for use in that country or for transit purposes. This process should both eliminate many importation disputes and reduce the need for individual users to seek individual authorizations in each country.

Leo One USA supports the GMPCS MoU approach and the Commission's commitment to domestic implementation of these arrangements. Prompt adoption of these proposed rules will facilitate movement of MSS terminal equipment in and out of the United States and will provide equipment manufacturers with greater certainty that their products will be able to be marketed globally.

Because the GMPCS-MoU is voluntary and addresses only the need to promote transborder flows of equipment, Leo One USA encourages the FCC to retain the flexibility to continue to license MSS terminal units under the Commission's existing rules. To the extent equipment is developed for niche uses unique to the United States or for fixed use, the GMPCS-MoU process may not be relevant to a particular receiver unit. In those cases, equipment should be eligible for the existing individual and blanket licensing options under current rules.

Respectfully submitted,

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